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August 1, 2019

**VIA E-MAIL
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (MG)**

Dear Judge Glenn:

Counsel for New GM writes in connection with the Avoidance Action Trust's and GUC Trust's respective requests to make distributions of trust assets filed at ECF Nos. 14552, 14565, and 14566 (collectively, the "Distribution Motions"). First, New GM writes to provide the Court with a copy of a letter that New GM filed with the MDL Court on July 30, 2019 apprising the MDL Court of the Distribution Motions and related filings recently made in this Court, and attaching copies of the filings referenced in the letter. The letter (without exhibits) is attached hereto as Exhibit A.

In addition, New GM supports the Economic Loss Plaintiffs' request set forth in their joinder filed at ECF No. 14575 to adjourn the hearing on the Distribution Motions until after the Status Conference in the MDL Court scheduled for August 15, 2019 at 9:30 a.m. Unfortunately, lead bankruptcy counsel for New GM has a preexisting conflict on August 15. Should the Court's calendar permit, New GM is available the following day on August 16, 2019 and is generally available during the week of August 19, 2019 (except for August 21). However, New GM will make itself available for a hearing on August 15, 2019, if that is the only available date that works for the Court and other parties.

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Respectfully submitted,

/s/ Paul M. Basta

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Counsel for General Motors LLC

Exhibit A

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July 30, 2019

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: GM LLC Ignition Switch Litig.*, 14-MD-2543 (JMF)

Dear Judge Furman:

As a follow-up to the March 1, 2019 Status Conference, attached please find additional new filings of relevance:

(1) Motion of Motors Liquidation Company Avoidance Action Trust for Entry of an Order Pursuant to Sections 105 and 1142 of the Bankruptcy Code and Bankruptcy Rule 3020 Approving the Distribution Plan to the Avoidance Action Trust's Beneficiaries, filed July 8, 2019 (Ex. A hereto). Pursuant to this motion, the MLC Avoidance Action Trust seeks authority to distribute approximately \$103 million to holders of Allowed General Unsecured Claims in the Old GM bankruptcy case.

(2) Motion of Wilmington Trust Company, as GUC Trust Administrator, For an Order (A) Authorizing the Expedited Payment of Excess GUC Distributable Assets Pursuant to Section 5.4 of the GUC Trust Agreement, and (B) Approving Such Distribution As An Appropriate Exercise of the GUC Trust Administrator's Rights, Powers and/or Privileges Pursuant to Section 8.1(e) of the GUC Trust Agreement, filed July 23, 2019 (Ex. B). Pursuant to this motion, the MLC GUC Trust seeks authority to distribute on an expedited basis \$320,880,639 to holders of Allowed General Unsecured Claims in the Old GM bankruptcy case.

(3) Motion of Wilmington Trust Company, as GUC Trust Administrator, for an Order Authorizing Expedited Distribution to Holders of 502(h) Claims Resulting From the AAT Settlement Agreement Pursuant to Sections 5.3 and 5.8 of the GUC Trust Agreement, filed July 23, 2019 (Ex. C). Pursuant to this motion, the MLC GUC Trust seeks authority to distribute on an expedited basis \$68,471,056.60 to holders of Allowed General Unsecured Claims in the Old GM bankruptcy case that arose pursuant to Section 502(h) of the Bankruptcy Code after the global settlement in the JPMorgan Term Loan Avoidance Action was approved by the Bankruptcy Court.

KIRKLAND & ELLIS LLP

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(4) Objection and Reservation of Rights of General Motors LLC With Respect to Motion of Avoidance Action Trust for Entry of an Order Approving the Proposed Distribution Plan, filed July 29, 2019. (Ex. D).

In light of these new filings, and as a follow-up to the in-Chambers Conference at the March 1, 2019 Status, New GM proposes an in-Chambers discussion following the Status Conference on August 15, 2019, or, if the Court prefers, an earlier discussion by telephone.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Martin Glenn
Counsel of Record